

1. The TMA is the proper and logical entity to respond to the SCOTH letter on behalf of the industry. There is an established practice of industry scientists working under the auspices of the TMA to assist the U.K. government in its periodic review of the U.K. list of approved ingredients. It is my understanding that industry scientists have recently been working through the TMA to assist the U.K. government in revising the Fourth Report (ingredients list) of the ISCSH (a predecessor to SCOTH). Also, SCOTH sent its inquiry to the TMA recognizing its historical role in facilitating industry cooperation with government on ingredients issues.
2. Ten of the eleven compounds listed in SCOTH's letter of August 1 were included in the permitted list of additives in the ISCSH's Fourth Report. There are maximum permitted levels for ten compounds regarding their use in manufacturing cigarettes and handrolling tobacco. There are maximum permitted levels for three of the compounds regarding their use in cigar and pipe tobacco. In response to SCOTH's request for quantitative information, perhaps TMA's initial response could be that all of its members (including PM as an associate member) have certified that they do not use any of the ammonium compounds in an amount that exceeds the maximum permitted limits for the respective categories of tobacco products. With regard to those ammonium compounds for which there are no maximum permitted limits, it may be reasonable to point out that the absence of any maximum permitted limits could be interpreted to reflect the assessment of the ISCSH that the use of those compounds in any amount did not present health or other concerns.

SCOTH also asked if these compounds are used singly or in combination. Again, TMA's initial response could focus on the fact that the inclusion of multiple ammonium compounds on the approved list contemplates that they can and will be used in various combinations in tobacco products.

3. SCOTH is likely to require some specific information regarding quantities of the ammonium compounds used and combinations of those compounds used. This information could be compiled in confidence by TMA's legal counsel, Lovell White Durrant, and submitted to SCOTH on an industry basis.

For example, each company could provide Lovell White Durrant the maximum use level for each of the eleven compounds for each class of tobacco product it retails in the U.K. This could be done without identifying the brand in which the compounds are used. Lovell White Durrant could then select the highest maximum use level for each compound for each class of tobacco product and a list of maximum use levels for all eleven compounds for each class of tobacco product (cigarettes, RYO, pipe and cigar) could be submitted for the industry by TMA to SCOTH with no attribution of the information to a company or to a brand.

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A similar approach could be taken with respect to combinations of the eleven compounds used. One approach could be to have each company provide to Lovell White Durrant the maximum combination of the eleven ammonium compounds used for each of the four classes of tobacco products. Lovell White Durrant could select the largest combination of these compounds for each product class and the TMA could provide this information to SCOTH without attribution to a specific company or brand. For example, the information might show that of all TMA's members the greatest combination of these compounds found in any cigarette retailed in the U.K. was six and the six compounds would be listed. Similar information could be provided for RYO, pipe tobacco and cigars.

I'm sure there are other methods of compiling and presenting this information on an industry basis through the TMA. Perhaps the above suggestions could serve as a starting point for a discussion among TMA member scientists at their August 24 meeting.

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